

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Civil No. 08-11122
Honorable George Caram Steeh
Magistrate Judge Virginia M. Morgan

ONE HUNDRED THREE THOUSAND
THREE HUNDRED FORTY-FIVE
DOLLARS IN UNITED STATES CURRENCY
(\$103,345.00);

Defendant.

_____ /

**STIPULATION TO STAY
CIVIL FORFEITURE PROCEEDING**

Plaintiff, the United States of America, and Claimant, David Stronski, by and through their respective attorneys, hereby acknowledge that a criminal investigation is currently being conducted related to the instant civil forfeiture case, and stipulate to the entry of an order for a stay of the above-captioned civil forfeiture proceeding pursuant to 18 U.S.C. § 981(g)(1), or alternatively, 18 U.S.C. § 981(g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or both parties as described in the cited statutes; and that the stay continue during the pendency of the investigation and the related criminal proceeding, or until further order of the Court as provided in the accompanying Order.

On April 2, 2008, Cherubim E. Hurdle filed a "claim" in this case, indicating that she was filing the "claim" in a representative capacity on behalf of as of yet unrepresented, "future clients"

who are or were “innocent owners or bystanders.” See Docket No. 10. The “claim”, moreover, was not verified as required by statute. A resident of Iowa, she has filed numerous such "claims" in other cases since the recent inception of the nationwide internet noticing system. Lacking any pecuniary interest by her own admission, she is without Article III standing to participate in this case, or concur in or object to a stay in this case. The parties request that the accompanying order be entered without her stipulation, and entered whether or not her “claim” has been formally stricken.

STEPHEN J. MURPHY
United States Attorney

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(P-34653)

Dated: April 16, 2008

s/JAMES L. FEINBERG
Attorney for Claimant David Stronski
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Email: jlfdefense@mindspring.com

Dated: April 16, 2008

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ORDER STAYING CIVIL FORFEITURE PROCEEDINGS

Upon the accompanying Stipulation to Stay Civil Forfeiture Proceeding, and it appearing that good cause for the stay has been shown given that the United States is conducting a criminal investigation related to the instant civil forfeiture case, and the Court being otherwise fully advised in the premises, now, therefore;

IT IS HEREBY ORDERED that all proceedings in this civil forfeiture case shall be stayed during the pendency of the related criminal investigation and any related criminal proceedings except as provided for below, or until further order of the Court, without prejudice to either party to seek an advance termination or an extension of the stay.

IT IS FURTHER ORDERED that, notwithstanding the stay, the United States and Cherubim E. Hurdle shall be allowed to file pleadings in connection with the "claim" of Cherubim E. Hurdle.

IT IS FURTHER ORDERED that upon termination of the stay, the parties shall be afforded a reasonable time to file answers and witness lists, conclude discovery, and file dispositive motions prior to any pretrial or trial proceedings.

Dated: April 17, 2008

s/George Caram Steeh
HONORABLE GEORGE CARAM STEEH
United States District Judge